

ORIGINAL

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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

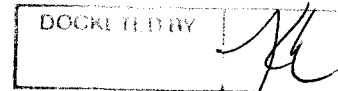
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IN THE MATTER OF THE APPLICATION)
OF SUNZIA TRANSMISSION LLC, IN)
CONFORMANCE WITH THE)
REQUIREMENTS OF ARIZONA REVISED)
STATUTES 40-360, ET. SEQ., FOR A)
CERTIFICATE OF ENVIRONMENTAL)
COMPATIBILITY AUTHORIZING THE)
SUNZIA SOUTHWEST TRANSMISSION)
PROJECT, WHICH INCLUDES THE)
CONSTRUCTION OF TWO NEW 500 KV)
TRANSMISSION LINES AND)
ASSOCIATED FACILITIES ORIGINATING)
AT A NEW SUBSTATION (SUNZIA EAST))
IN LINCOLN COUNTY, NEW MEXICO,)
AND TERMINATING AT THE PINAL)
CENTRAL SUBSTATION IN PINAL)
COUNTY, ARIZONA. THE ARIZONA)
PORTION OF THE PROJECT IS LOCATED)
WITHIN GRAHAM, GREENLEE,)
COCHISE, PINAL, AND PIMA COUNTIES.)



DOCKET NO. L-00000YY-15031800171

Case No. 171

REQUEST FOR REVIEW of Christina
McVie

On September 2, 2015 Sunzia Transmission, LLC filed an Application for a Certificate of Environmental Compatibility ("CEC") authorizing construction of its Southwest Transmission Project. The Arizona Power and Transmission Line Siting Committee (Committee) granted the undersigned Christina McVie intervention in the matter on October 19th, 2015. The Committee issued a CEC approving the Project on November 24, 2015 after a 13-day hearing.

1 **I. Introduction**

2 This request for review of the Certificate of Environmental Compatibility ("CEC") is
3 filed pursuant to A.R.S. § 40.360.07(A), which provides that any party to a certification
4 proceeding may request a review of the Line Siting Committee's decision by the Arizona
5 Corporation Commission.
6

7 **II. Criteria for evaluation of the CEC and decision by the Committee**

8 This request for review requests the Commission deny the CEC recommended by the
9 Arizona Power Plant and Transmission Line Siting Committee due to the Committee's failure to
10 adequately address **A.R.S. § 40-360.06 - Factors to be considered in issuing a certificate of**
11 **environmental compatibility:**

12 A. 1: "Existing plans of this state, local government and private entities for other
13 developments at or in the vicinity of the proposed site";

14 A. 2: "Fish, wildlife and plant life and associated forms of life on which they are
15 dependent";

16 A. 4: "The proposed availability of the site to the public for recreational purposes,
17 consistent with safety considerations and regulations";

18 A. 5: "Existing scenic areas, historic sites and structures or archaeological sites at or in
19 the vicinity of the proposed site";

20 A. 6: "The total environment of the area";

21 A. 7: "The technical practicability of achieving a proposed objective and the previous
22 experience with equipment and methods available for achieving a proposed objective";
23 and

24 A. 9: "Any additional factors that require consideration under applicable federal and state
25 laws pertaining to any such site", and

26 **Factor B:** "The committee shall give special consideration to the protection of areas
27 unique because of biological wealth or because they are habitats for rare and endangered
28 species."

1 Due to the Project's proposed impacts on Pima County's Conservation Lands System (CLS) and
2 pending Multi-species Habitat Conservation Plan (MSCP), and Arizona Game and Fish
3 Department's (AGFD) documented regional wildlife movement and connectivity corridors;
4 riparian areas, rare and sensitive grasslands, extremely old-growth ironwood tree and saguaro
5 upland Sonoran desert vegetative communities, and Globally Important Bird Areas (IBAs);
6 recreational opportunities and their positive, sustainable impacts on local, state and regional
7 economies; cultural heritage, biological wealth and habitats for rare and endangered species of
8 the San Pedro River Watershed; the total environment of southeast Arizona; and AGFD
9 mandated state management of wildlife, this CEC should be denied.

10 In addition, the undersigned respectfully disagrees with the "Findings of Fact and
11 Conclusions of Law" #4 and #5.

12 To date, this Project and the conditions placed on the Project in this CEC *do not*
13 *effectively minimize the Project's impact on the environment and ecology of the state nor do the*
14 *conditions placed on the Project in this CEC resolve matters concerning balancing the need for*
15 *the Project with its impact on the environment and ecology of the state.* To the contrary, while
16 this may be termed a Certificate of ENVIRONMENTAL COMPATIBILITY, at this point in
17 time it is anything but that and will require Commission action in order to deserve that title.

18 19 **III. Testimony related to the CEC criteria for evaluation**

20 Testimony at the Line Siting Hearing by Ms. Tice Supplee, Mr. Scott Wilbor and Ms.
21 Christina McVie was unequivocal and unrefuted in establishing the unique characteristics,
22 extensive cultural heritage, Outstanding Arizona Waters, species richness, presence of rare,
23 threatened and endangered species, and extraordinary biodiversity of southeast Arizona per
24 A.R.S. § 40-360.06 A and B.

25 Ms. Supplee, former Game Branch Chief of the Arizona Game and Fish Department from
26 1988-2004 and Wildlife Habitat Program Manager of the AGFD's southeastern Arizona Region
27 5 from 1979-1988, testified regarding recent research by Boykin and Kepner *et al* which
28 established that, for the 817 terrestrial vertebrate species that reside, breed, or use the habitat

1 within the 5-state Southwest study area for a significant portion of their life history, the San
2 Pedro Watershed has the highest level of species richness and is the single most biodiverse area
3 within the entire arid southwest, an area comprising approximately 20% of the conterminous
4 United States. Ms. Supplee testified that the San Pedro Watershed supports one of the highest
5 numbers of mammal species in the world and provides critical habitat and a migration corridor
6 for hundreds of bird species; that approximately one third of the lower river valley corridor is
7 now in protected status, after over \$42 million in conservation investments; that stream flow and
8 habitat conditions are improving; and that the Watershed has been a focal point for conservation
9 and mitigation investments because of the opportunity to protect and restore a relatively
10 undisturbed river system, cross-valley wildlife movement, and ecological processes such as fire
11 that maintain ecosystem health.

12 Ms. Supplee informed the Committee that the AGFD has established a recreation strategy
13 to "identify, assess, develop, and promote watchable wildlife recreational opportunities" in
14 addition to promoting sustainable harvests via hunting and that among the harvestable
15 subgroups, metric values for big game, small game, and upland game are greater in the San
16 Pedro Watershed than elsewhere in the southwest study area, providing recreational and cultural
17 services. She testified that total species richness is a fundamental metric of biodiversity that is
18 used to characterize conservation areas of interest and that metrics reflecting harvestable species
19 and high bird species richness represent economic, recreational, and esthetic value. Ms. Supplee
20 further reported that 1.6 million people participated in some form of watchable wildlife
21 recreation in Arizona in 2011, primarily observing birds followed by mammals, amphibians and
22 reptiles, and that the total economic effect from 2011 watchable wildlife activities in Arizona
23 was \$1.4 billion.

24 Ms. Supplee testified further that sky island grasslands, such as those in southeastern
25 Arizona, are of great conservation concern for birds and other species and, while they are
26 threatened by shrub and non-native species incursion, many of them are restorable. The National
27 Fish & Wildlife Foundation describes them as one of America's great hotspots for wildlife
28 diversity, hosting more than twice as many mammal species as Yellowstone National Park and

1 supporting the nation's highest diversity of reptiles, bees and ants. NFWF has targeted \$13-15
2 million for investment from 2010-2020 to leverage an additional \$265 million for the region,
3 including the AGFD Bonita Restoration Project potentially adversely impacted by the proposed
4 SunZia Transmission Line (s) north of Willcox.

5 Ms. Supplee also testified regarding potential adverse impacts to the National Audubon
6 Society's Important Bird Area Program and specifically to the Pinaleño Mountains Global IBA,
7 the Willcox Playa and Cochise Lakes Global IBA, the Lower San Pedro River Global IBA, and
8 the Tucson Sky Island Global IBA. These areas represent globally important avian migration
9 corridors and provide such ecosystem services as pollination of crops and other plants, and insect
10 and disease control, in addition to recreational opportunities.

11
12 Mr. Wilbor testified that the San Pedro Watershed is a part of the second least fragmented
13 region in Arizona, according to AGFD's HabiMap, and hosts numerous AGFD Species of
14 Greatest Conservation Need and Species of Economic and Recreational Value, including rare,
15 threatened and endangered species. Species move between the main stem of the river and higher
16 forested elevations, traversing up and down gradient along its many riparian tributaries, utilizing
17 these as wildlife movement corridors, as initially described by the AGFD/ADOT *et al* 2006
18 Arizona's Wildlife Linkages Assessment and subsequently refined by county specific studies.
19 Species observed moving upslope and downslope include both the federally threatened Mexican
20 Spotted Owl and Yellow-billed Cuckoo. Recent Yellow-billed Cuckoo survey results, conducted
21 by the Tucson Audubon Society under contract with the USFS, were included in the Tucson
22 Audubon Society's Limited Appearance and Mr. Wilbor's testimony.

23
24 Both Mr. Wilbor and Ms. Supplee testified to the varied and numerous ecosystem
25 services and recreational opportunities provided by the region that contribute significantly to the
26 local, state and regional economies.

27
28 Ms. McVie presented evidence and testified to the extremely old growth ironwood tree

1 and saguaro habitat potentially adversely impacted by SunZia and the significant challenges
2 entailed in salvage and transplantation of same, noting that ironwoods may be up to 1200-1500
3 years of age and saguaros may be up to 250-300 years of age. She also called into question the
4 practicability of achieving no net loss of flowering of agaves and saguaros, within 5 years of
5 construction, per the requirements of the Biological Opinion of the USFWS.

6 Ms. McVie presented testimony regarding potential negative impacts to AGFD
7 documented wildlife linkage movement corridors along the proposed route, in addition to the
8 testimony of Ms. Supplee and Mr. Wilbor, including the Galiuro-Pinaleño-Dos Cabezas
9 Mountains Wildlife Linkage, the Santa Catalina/Rincon-Galiuro Mountains Wildlife Linkage,
10 the Ironwood Forest National Monument-Picacho Mountains-Durham-Coronado Plains Wildlife
11 Linkage and the Pima and Pinal County Wildlife Linkage Assessments conducted by the AGFD.
12 As stated in the wildlife linkage reports referenced, "the Sonoran Desert Ecoregion is home to
13 more than 200 threatened species, and its uniqueness lends to a high proportion of endemic
14 plants, fish, and reptiles (Marshall et al. 2000; The Nature Conservancy 2006). More than 500
15 species of birds migrate through, breed, or permanently reside in the ecoregion, which are nearly
16 two-thirds of all species that occur from northern Mexico to Canada (Marshall et al. 2000). The
17 Sonoran Desert Ecoregion's rich biological diversity prompted Olson and Dinerstein (1998) to
18 designate it as one of 233 of the earth's most biologically valuable ecoregions, whose
19 conservation is critical for maintaining the earth's biodiversity."

20 Ms. McVie presented testimony regarding the public process and adoption of the Pinal
21 and Pima County state-mandated Comprehensive Plans, in compliance with Growing Smarter
22 and Growing Smarter Plus legislation, including the requirements of Pima County for
23 compensatory mitigation for both impacts to their Conservation Lands System and their pending
24 Multi-species Conservation Plan and Incidental Take Permit under Section 10 of the Endangered
25 Species Act of 1973.

26 27 **IV. Conditions that would address concerns about mitigation of impacts**

28 During the Committee's deliberations regarding this CEC, they requested the Applicant

1 provide the "gold standard" of mitigation for this Project. Despite the Committee's best
2 intentions, that did not happen. This Project and the conditions placed on the Project in this CEC
3 do not effectively minimize the Project's impact on the environment and ecology of the state nor
4 do the conditions placed on the Project in this CEC resolve matters concerning balancing the
5 need for the Project with its impact on the environment and ecology of the state. Mitigation of
6 the proposed Project was NOT adequately addressed by the Committee. I strongly believe that
7 the Commission should deny a CEC for this case because the admitted adverse environmental
8 impacts far outweigh the potential benefits to the state of Arizona, and I urge the Commission to
9 do so. However, in the event the Commission nonetheless decides to grant a Certificate of
10 ENVIRONMENTAL COMPATIBILITY, the undersigned requests the Commission modify the
11 CEC for this case to include certain proposed conditions which were not adopted by the
12 Committee.

13 The purpose of Environmental Mitigation is to offset otherwise lawful impacts to existing
14 cultural, historic, or natural resources such as streams, wetlands, sensitive wildlife habitats, rare
15 or endangered species, archeological sites or historic structures. Mitigation has tiers that may
16 generally be defined as:

- 17 (a) Avoiding an impact altogether;
18 (b) Minimizing the impacts of an action and its implementation;
19 (c) Rectifying the impacts by repairing, rehabilitating, or restoring the affected environment;
20 (d) Reducing or eliminating the impact over time by actions taken during the life of the Project
21 and
22 (e) Compensating for the impact by replacing or providing substitute resources or environments.

23 The *Pro Se* Interveners provided evidence that demonstrated the technological feasibility
24 of the use of helicopters for surveys and construction, including tower placement, stringing,
25 tensioning operation and maintenance of any transmission line(s), which could be successfully
26 be employed for any and all activities in biologically sensitive waters or habitats or culturally
27 sensitive sites, based on the completion of the Antelope-Pardee 500-kV Transmission Project
28 portion of the Tehachapi Renewable Transmission Project in the Angeles National Forest in

1 California. The Committee concluded, per A.R.S. § 40-360.06 Factor 7, that this approach IS
2 technically practicable for achieving the proposed objective of avoiding and minimizing impacts
3 of the proposed Project and that there IS previous experience with the equipment and methods
4 available for doing so. However, in Condition 26 of the proposed CEC, this is only applied to an
5 eight mile portion of the proposed Project within the San Pedro River Watershed in the vicinity
6 of Paige Canyon. Despite the *Pro Se* Intervener's evidence, the public comments of Archaeology
7 Southwest and the Tucson Audubon Society, and The Nature Conservancy's and Pima County's
8 Limited Appearances, Condition 26 only states that SunZia "will work with ASLD in
9 determining how, when, and where the use of helicopters can assist in mitigating the impact of
10 construction activities, setting transmission structures and conductors, including tower
11 placement, stringing, tensioning, and operation and maintenance of any transmission line (s) on
12 biological and cultural resources in the remainder of the San Pedro River Valley in which the
13 Project will be built. All of the above shall take into account, where relevant, the potential air
14 wash effect of and/or tribal sensitivity to the use of helicopters near cultural sites, Nothing in the
15 foregoing precludes the Applicant from considering or utilizing aerial construction along other
16 portions of the Route." This is an insufficient commitment and could be strengthened by the
17 Commission.

18 With adequate consideration of the evidence of record and A.R.S. § 40-360.06 Factors A
19 1, 2, 4, 5, 6, 7 and 9 and B, I respectfully request the Commission adopt recommendations made
20 within the Limited Appearances of The Nature Conservancy and Pima County, and the public
21 comment letters of the Tucson Audubon Society and Archaeology Southwest, to modify
22 proposed CEC Condition #26 to require that:

23
24 "SunZia shall utilize helicopters for any and all construction activities within the San
25 Pedro River watershed and riparian areas and may be used in upland Sonoran desert,
26 grasslands, and wooded areas, as determined to be technically feasible and desirable, in
27 consultation with the Arizona State Land Department, land managers, the Arizona Game
28 and Fish Department, and the Southeast Arizona Ecological Field Office of the USFWS,

1 taking into account, where relevant, the potential air wash effect of and/or tribal
2 sensitivity to the use of helicopters near cultural sites. The goal shall be to completely
3 avoid the construction of any new roads, especially in the San Pedro Watershed, and that
4 existing roads and bordering vegetation not be altered or degraded from their existing
5 state as a result of the Project. In addition, at riparian crossings, towers and conductors
6 shall be of sufficient height to avoid tree removal or modification required to meet NESC
7 and FERC safety standards.”
8

9 Under A.R.S. § 17-102, Chapter 1, Article 1, “Wildlife, both resident and migratory,
10 native or introduced, found in this state, except fish and bullfrogs impounded in private ponds or
11 tanks or wildlife and birds reared or held in captivity under permit or license from the
12 commission, are property of the state...”. The Arizona Game and Fish Commission establishes
13 policy for the management, preservation, and harvest of wildlife. The Commission makes rules
14 and regulations for managing, conserving, and protecting wildlife and fisheries resources, and
15 off-highway vehicle operations for the benefit of the citizens of Arizona. In support of the
16 Commission's obligations, the Director of the Arizona Game and Fish Department, as chief
17 administrative officer, provides policy, general supervision and control of all Department
18 functions and activities. The Department Operating Manual Section I: Wildlife, Habitat and the
19 Environment, Chapter 2: Habitat and the Environment, Section 3: Wildlife and Wildlife Habitat
20 Compensation, states, “It shall be the policy of the Department to develop adequate
21 compensation plans for actual or potential habitat losses resulting from land and water projects in
22 accordance with State and Federal laws. Habitat compensation plans will seek compensation at a
23 100% level, where feasible, and will be developed using habitat resource category designations.”
24 It further states, “The Director of the Arizona Game and Fish Department is authorized under
25 A.R.S. § 17-211(D) to perform the necessary administrative tasks required to manage the
26 wildlife resources of the State of Arizona. Pursuant to those duties and in accordance with
27 federal environmental laws and resource management acts, such as the National Environmental
28 Policy Act, Fish and Wildlife Coordination Act, and Endangered Species Act, the Director is

1 further charged with cooperating in the determination of potential impacts to Arizona's wildlife
2 resources resulting from federally funded land and water projects. In addition, a Commission
3 M.O.U. assigns similar responsibilities for evaluating proposed projects on lands administered by
4 the State Land Department. An integral part of this process is the development of adequate
5 compensation measures aimed at eliminating or reducing project-associated impacts."
6 Furthermore, under the provisions of A.R.S. § 17-231, Chapter 2, Article 3, "B. 7. The Arizona
7 Game and Fish Commission may enter into agreements with the federal government, with other
8 states or political subdivisions of the state and with private organizations for the construction and
9 operation of facilities and for management studies, measures or procedures for or relating to the
10 preservation and propagation of wildlife and expend funds for carrying out such agreements.",
11 and, under "B. 14. Solicit and accept grants, gifts or donations of money or other property from
12 any source, which may be used for any purpose consistent with this title." A.R.S. § 17-241 states
13 the Commission may "2. Acquire by purchase, lease, exchange or gift lands or waters for use as
14 fish hatcheries, game farms, shooting areas, firing ranges or other purposes necessary to carry
15 out the provisions of this title."

16 With adequate consideration of A.R.S. § 40-360.06 Factors A 1, 2, 4, 5, 6, 7 and 9 and B,
17 I respectfully request the Commission modify the CEC to add Condition #38, to reflect the
18 substantial interest and statutory responsibility of the Arizona Game and Fish Commission and
19 Department in managing, conserving and protecting wildlife and fisheries resources and for the
20 safe and regulated off-highway vehicle operations for the benefit of the citizens of Arizona to
21 read:

22 "38. AGFD shall determine additional compensatory mitigation for potential wildlife
23 habitat and wildlife corridor losses, degradation and residual impacts to the state per their
24 statutory authorities. Unauthorized access to the right of way, such as by off-road vehicle
25 use, shall be controlled, monitored, and adaptively managed for the life of the Project,
26 and funded by the Applicant. In areas of pronghorn habitat and other sensitive grasslands,
27 tower structure type and transmission line placement shall be coordinated with AGFD
28 such that prescribed fire shall continue to be a viable management option for grassland

1 habitat management. Where fencing is placed or replaced, consultation with the
2 landowner, land manager and AGFD shall determine the appropriate type of fencing
3 using AGFD's Guidelines."
4

5 The threat posed by the potential introduction of exotic invasive species, especially
6 buffelgrass, was discussed in testimony offered by Ms. Supplee, Mr. Wilbor and Ms. McVie.
7 Buffelgrass is unique in that it outcompetes and suffocates native species and eventually
8 establishes a monoculture of African grass that burns faster and hotter than anything fire
9 management authorities have previously dealt with. The Sonoran desert ecosystem has never
10 developed an adaptation to fire. The threat to lives, public and private property, and the entire
11 Sonoran desert ecosystem cannot be overstated. With adequate consideration of A.R.S. § 40-
12 360.06 Factors A 1, 2, 4, 5, 6, 7 and 9 and B, I respectfully request that the Commission modify
13 the CEC to add Condition #39 stating:

14 "39. SunZia, its successors and/or assignees shall, in conjunction with the Arizona State
15 Land Department, AGFD and potentially impacted land managers, develop and fund a
16 program to monitor and adaptively manage invasive species within and adjacent to its
17 rights of way and any roads utilized by SunZia, its agents/contractors, successors or
18 assignees, and shall maintain the program for the life of the Project, or through
19 decommissioning."
20

21 **V. Conditions that would address concerns about misrepresentation of the Project**

22 Near the end of the end of the Line Siting Committee Hearing on November 19th, 2015,
23 Member Olea suggested a number of Conditions, stating he specifically wished to put them on
24 the record for the Commission's benefit and review, which would guarantee that the speculative,
25 precedent setting SunZia merchant line would actually carry renewable energy from New
26 Mexico to Arizona to benefit our state. I hope the Commission will study them and the
27 Applicant's response carefully.

28 In the spirit of Member Olea's obvious and sincere concern, and with adequate

1 consideration of A.R.S. § 40-360.06 Factors A 1, 2, 4, 5, 6, 7 and 9 and B, I respectfully request
2 that the Commission modify the CEC to add Conditions #40 and #41 stating:

3 “40. To ensure that the main stated objective of this Project is achieved and that the
4 Project will be completed as a whole, construction of the first SunZia 500 kV line shall
5 not commence in Arizona until the full extent of anchor tenant transmission rights for the
6 first line (50% of capacity) granted under Federal Energy Regulatory Commission
7 (FERC) Order in docket number EL11-24-000 has been committed to signed power
8 purchase agreements and fully executed anchor tenant contracts that will result in
9 renewable energy generation interconnections to the SunZia East substation in Lincoln
10 County, New Mexico.”

11 And,

12 “41. Line construction of the first SunZia line shall be initiated at the Willow Substation
13 and shall first commence eastward toward the New Mexico renewable energy resources
14 in Lincoln County, New Mexico, energizing the two successive eastward line segments
15 from the TEP interconnection at Willow. To prevent the potential unnecessary loss of
16 high environmental value in the San Pedro watershed in the event of financial failure for
17 the New Mexico portion of the Project, the last route segment to be completed shall be
18 the segment between the Willow Substation and the Pinal Central Substation.”

19
20 Requested Condition #41 is particularly pertinent given comments of the Committee
21 members prior to their vote. In the transcript of the Line Siting Hearing, November 19th, 2015,
22 VOL XIII, page 2704, line 4, Chairman Chenal echoed the comments of many Members of the
23 Committee when he said, “I am very upset that there is not an alternate route.” At line 11 he said,
24 “I think this is a perfect example of the worst of the decision, of the effort to find the least worst
25 decision. And boy, if there has ever been a case that demonstrates that, I think this is it. The
26 jewel, the San Pedro River Valley is pristine. That tour that we took, it was beautiful, absolutely
27 beautiful. And my heart just breaks that, you know, there is going to be a transmission line that's
28 going through there.” On page 2705, line 21 the Chairman said, “So I vote aye, reluctantly, and it

1 is painful for me to do it. Because I think that statute does mean something, that statute that
2 requires special consideration be given to areas such as the San Pedro River Valley.”
3

4 **VI. Conclusion**

5 My response to Chairman Chenal's and other Member's comments is this: the Committee
6 had the option and authority to deny this Project and so does the Commission. The Committee is
7 not required, based on what is arguably a flawed BLM process that was largely driven by federal
8 government and the New Mexico BLM Office, to approve this Project. Even Mr. Ray Sauzo,
9 head of the Arizona BLM Office, in his appearance before the Committee, stated for the record
10 that he and the Arizona BLM Office neither supported nor opposed this Project. The
11 Commission has the authority and the opportunity to do the right thing for the state of Arizona. I
12 strongly believe this Project is not truly mitigatable and urge you to deny this CEC – it is not the
13 “gold standard” of mitigation nor does it make the proposed SunZia Project environmentally
14 compatible.

15 However, if you chose to approve and grant this Project a CEC, with adequate
16 consideration of A.R.S. § 40-360.06 Factors A 1, 2, 4, 5, 6, 7 and 9 and B, I respectfully
17 encourage you to strengthen the CEC such that it actually demonstrates some level of
18 environmental compatibility by adopting the undersigned's proposed revisions and additions.
19

20 Respectfully submitted 12/09/2015,

21 *Christina McVie*
22
23

24 ORIGINAL and 25 COPIES of the foregoing hand-
25 delivered on this 9th day of December 2015 to:
26 Arizona Corporation Commission
27 Docket Control
28 1200 W. Washington Street

1 Phoenix, AZ 85007-2996
2 Copy sent to Chairman Thomas Chenal via email and
3 regular mail on December 9, 2015.
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